

ATTACHMENT 9A

The following Case-by-Case permits in other states have been identified that provide a precedent for DHEC to utilize the surrogates as proposed in the Pee Dee Notice of MACT Approval.

- ▲ Virginia Electric and Power Company – Wise County, Virginia (Dominion Wise) Case-by-Case MACT Permit for two (2) CFB boilers¹
 - PM for non-mercury metal HAP
 - CO for organic HAP
- ▲ Southwest Electric Power Company’s John W. Turk, Jr. Power Plant – Hempstead County, Arkansas (SWEPCO Turk) Case-by-Case MACT Permit for one (1) USCPC boiler²
 - Filterable PM₁₀ for non-mercury metal HAP
 - VOC for organic HAP
- ▲ Dynegy Services Plum Point, LLC – Mississippi County, Arkansas (Plum Point) Case-by-Case MACT Determination for one (1) PC boiler³
 - PM₁₀ for non-mercury metal HAP
 - VOC for organic HAP
- ▲ Santee Cooper Cross Generating Station – Pineville, South Carolina (Cross Generating Station) Case-by-Case MACT for two PC boilers⁴
 - PM for non-mercury metal HAP
 - SO₂ for acid gas HAP
 - CO for organic HAP
- ▲ Wolverine Power Supply Cooperative, Inc. – Rogers City, Michigan (Wolverine) Draft Permit to Install and Notice of MACT Approval for two (2) CFB boilers⁵
 - PM for non-mercury metal HAP
 - VOC for organic HAP⁶
- ▲ Wisconsin Public Service Corporation – Weston Plant – Rothschild, Wisconsin (Weston) 112(g) MACT for one (1) SCPC boiler⁷

¹ Article 7 (40 CFR Part 63 112(g)) Case-by-Case MACT Permit – Stationary Source Permit to Construct and Operate, Registration No. 11526. Virginia Electric and Power Company, June 30, 2008.

² ADEQ Operating Air Permit No. 2123-AOP-R0. John W. Turk, Jr. Power Plant, November 5, 2008. SWEPCO did not propose the use of SO₂ as a surrogate for acid gas HAP, and the Arkansas Department of Environmental Quality issued the permit with SWEPCO’s requested HCl and HF limits. In the *Response to Comments 112(g) MACT Permit*, ADEQ did acknowledge the beneficial use of the SO₂ CEMS to support compliance with acid gas HAP (see response to comment No. 39 on page 106 of 125).

³ ADEQ Operating Air Permit No. 1995-AOP-R2. Dynegy Services Plum Point LLC, January 11, 2008.

⁴ Office of Environmental Quality Control Bureau of Air Quality – PSD, NSPS, Case-by-Case MACT, Synthetic Minor Construction Permit No. 0420-0030-CI. Santee Cooper Cross Generating Station, February 5, 2004.

⁵ Draft Permit to Install No. 317-07 – Wolverine Power Supply Cooperative, Inc., September 9, 2008.

⁶ Appendix 3 of the Fact Sheet for the Draft Permit to Install No. 317-07 identifies continuous monitoring of CO as compliance demonstration support for organic HAP, p. 46.

- PM₁₀ for non-mercury metal HAP
- SO₂ for acid gas HAP
- VOC for organic HAP
- ▲ Tucson Electric Power Company Springerville Generating Station – Springerville, Arizona (Springerville) Case-by-Case MACT for two (2) PC boilers⁸
 - PM for non-mercury metal HAP
 - Fluorides for acid gas HAP (as HF)⁹
- ▲ Intermountain Power Service Corporation – Millard County, Utah (Intermountain 3) Case-by-Case MACT for one (1) PC boiler¹⁰
 - PM for non-mercury metal HAP
 - SO₂ for acid gas HAP
 - CO for organic HAP
- ▲ NEVCO Energy Company LLC - Sevier County, Utah (NEVCO Sevier) Case-by-Case MACT for one (1) CFB boiler¹¹
 - PM for non-mercury metal HAP
 - SO₂ for acid gas HAP
 - CO for organic HAP
- ▲ MidAmerican Energy Company – Council Bluffs, Iowa (MidAmerican Council Bluffs) Notice of MACT Approval for one (1) PC boiler¹²
 - PM for non-mercury metal HAP
 - HCl for acid gas HAP
 - CO for organic HAP
- ▲ Indeck-Elwood Energy Center – Will County, Illinois (Indeck) 112(g) MACT for two (2) CFB boilers¹³

⁷ Air Pollution Control Construction Permit No. 03-RV-248 – Wisconsin Public Service Corporation – Weston Plant, October 19, 2004. Condition I.A.12.a.

⁸ Arizona Department of Environmental Quality Air Quality Class I Permit No. 1001554, Company Name: Tucson Electric Power Company, Facility Name: Springerville Generating Station, April 29, 2002.

⁹ The Arizona Department of Environmental Quality outlined their support for the use of surrogates for non-mercury metal HAP and acid gas HAP in Section VI.B. of the *Technical Support Document and Statement of Basis for Modification to Tucson Electric Power Company Springerville Generating Station*, December 21, 2002. pgs. 67- 70.

¹⁰ State of Utah Department of Environmental Quality Division of Air Quality Approval Order: PSD Major Modification to Add Unit 3 at Intermountain Power Generating Station, No. DAQE-AN0327010-04, October 15, 2004. Utah Department of Environmental Quality provided support for their use of surrogates in their response to Comment #45, pgs. 23-25 of the *Memorandum Re: Response to Comments received on IPSC Intent to Approve number DAQE-IN327010-04*, To: Intermountain Power Service Corporation (IPSC) File (N327010), October 14, 2004.

¹¹ State of Utah Department of Environmental Quality Division of Air Quality Approval Order: Sevier Power Company's 270 MW Coal-Fired Power Plant, No. DAQE-AN2529001-04, October 12, 2004.

¹² Iowa Department of Natural Resources Air Quality PSD Construction Permit and Notice of MACT Approval, MidAmerican Energy Company, Permit No. 03-A-425-P, June 17, 2003.

¹³ Construction Permit – PSD Approval NSPS-NESHAP Emission Units, Indeck-Elwood LLC Electricity Generation Facility, Site ID No. 197035AAJ, October 10, 2003. The Illinois Environmental Protection Agency supported the use of surrogates in Section VIII of the *Project Summary for a Construction Permit Application from Indeck-Elwood, LLC for the*

- PM for non-mercury metal HAP
- Volatile Organic Material (VOC) for organic HAP
- ▲ East Kentucky Power Cooperative, Inc. Hugh L. Spurlock Power Station – Mason County, Kentucky (Spurlock 3) Case-by-Case MACT for one (1) CFB boiler¹⁴
 - PM₁₀ for non-mercury metal HAP
 - VOC for organic HAP

Indeck-Elwood Energy Center, Elwood, Illinois. The US EPA Environmental Appeals Board supported the Illinois Environmental Protection Agency's use of surrogates in PSD Appeal No. 03-04, decided September 21, 2006, see pgs. 87-88 in response to H. *Fluoride Emissions*.

¹⁴ *Commonwealth of Kentucky Natural Resources and Environmental Protection Cabinet Department for Environmental Protection Division for Air Quality, Air Quality Permit for East Kentucky Power Cooperative, Inc.'s Hugh L. Spurlock Power Station, October 15, 2004.*